UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF WEST VIRGINIA AT CHARLESTON

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION Master File No. 2:12-MD-02327 MDL No. 2327

THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs whose cases are listed on the attached Exhibit A and Defendants Johnson & Johnson, Inc., Ethicon, Inc., and/or Ethicon LLC (collectively, the "Ethicon Defendants"), acting pursuant to F. R. Civ. P. 41(a)(1)(A)(ii), jointly move the court to dismiss with prejudice this action and all claims against the Ethicon Defendants which were, or could have been asserted. Each party shall bear her or its own costs.

Respectfully submitted,

/s/ G. Sean Jez

G. Sean Jez FLEMING NOLEN & JEZ, LLP 2800 Post Oak Blvd., Suite 4000 Houston, TX 77056 Counsel for Plaintiff /s/ Christy D. Jones
Christy D. Jones

BUTLER SNOW LLP P.O. Box 6010 Ridgeland, Mississippi 39158-6010 Counsel for the Ethicon Defendants

EXHIBIT A

FLEMING NOLAN JEZ

Case No.	Plaintiff Name (Last)	Plaintiff Name (First)
2:12-cv-03853	Ammons	Lynn
2:13-cv-12523	Andrews	Dee
2:12-cv-04257	Batis	GeorgeAnn
2:13-cv-01097	Bolt	Brenda
2:12-cv-05713	Branch	Jura T.
2:13-cv-02582	Britt	LaVerne
2:13-cv-09025	Bruner	Sherri
2:13-cv-19159	Bunnell	Helen R.
2:12-cv-03723	Champion	Joyce P.
2:13-cv-23545	Collins	Alice
2:13-cv-02567	Cooper	Dixie
2:12-cv-05679	Dailey	Kathy
2:13-cv-02599	Duplessis	Roberta
2:13-cv-10457	Duran	Irma
2:12-cv-04283	Franks	Keri S.
2:12-cv-03996	Glenn	Kim
2:12-cv-05715	Hibler	Susan
2:12-cv-05572	Hollaway	Martha
2:13-cv-00022	Jewett	Nancy J.
2:13-cv-04614	Kloever	Julie
2:12-cv-04174	Klotz	Josephine S.
2:13-cv-10459	Meisinger	Judith A.
2:13-cv-02555	Newcomb	Kathryne N.
2:12-cv-08163	O'Brien	June M.
2:12-cv-08166	Pynn	Wynne J.
2:13-cv-02553	Reynolds	Tanda
2:13-cv-01076	Riley	Sonya H.
2:13-cv-18947	Rodriguez	Yolanda
2:13-cv-09016	Schwyhart	Julia A.
2:13-cv-07757	Tolley	Gail
2:12-cv-05568	Young	Janett
2:12-cv-05312	Zaccardi	Cindy
2:12-cv-05694	Zutz	LaVonne T.